

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CLEAN HARBORS)	
ENVIRONMENTAL SERVICES, INC.,)	
Plaintiff)	
vs.)	CIVIL ACTION FILE NO.
CEDAR ENTERPRISES, INC., and)	1:11-CV-01350-CAP
STEVE MOKALLED, individually and)	
as Owner of Cedar Enterprises, Inc.,)	
Defendants)	

Supplement to Expedited Motion of Robert A. Bartlett

COMES NOW Robert A. Bartlett, a member of the State Bar of Georgia and of the bar of this Court (hereafter “Movant”), and hereby supplements his Expedited Motion previously filed with this Court on February 14, 2014 [Doc. No. 168] by tendering to this Court a true and correct electronic copy of the original signed *Certificate of Consent to Withdrawal of Counsel of Steve Mokalled and Declaration Regarding Same* attached hereto as Exhibit “A,” which Movant received by priority United States Mail on the afternoon of February 25, 2014.

Movant respectfully points out that Mr. Mokalled has provided a new mailing address as indicated by a notation on the copy of the fourth (4th) page of said Certificate [actually the fifth (5th) page of Exhibit “A”], to wit:

Steve Mokalled
c/o Pohl, PA
P.O. Box 27290
Greenville, SC 29216.

Pursuant to 28 U.S.C. § 1746, Movant declares, under penalty of perjury, that the facts stated herein are true and correct to the best of Movant's knowledge.

Dated: February 25, 2014.

Respectfully submitted,

/s/ Robert A. Bartlett.
Robert A. Bartlett
Georgia Bar No. 040550
rbartlett@rbspg.com

Ragsdale, Beals, Seigler,
Patterson & Gray, LLP
2400 International Tower
229 Peachtree St., N.E.
Atlanta, GA 30303
Telephone: (404) 588-0500
Fax : 404-523-6714

Previously Terminated or Withdrawing
attorney for Defendant Steve Mokalled

Exhibit “A”

IN THE UNITED STATES DISTRICT COURT
NORTHER DISTRICT OF GEORGIA
ATLANTA DIVISION

CLEAN HARBORS ENVIRONMENTAL)
SERVICES, INC.,)
Plaintiff)

vs.)

CEDAR ENTERPRISES, INC., and)
STEVE MOKALLED, individually and as)
Owner of Cedar Enterprises, Inc.,)
Defendants)

CIVIL ACTION FILE NO.

1:11-CV-01350-CAP

**Certificate of Consent to Withdrawal of Counsel
of Steve Mokalled and Declaration Regarding Same**

Steve Mokalled, pursuant to 28 U.S.C. § 1746, hereby declares:

1. I am over the age of twenty-one (21) years and am competent to testify to the matters contained in this affidavit, and have personal knowledge of the same.
2. I am a Defendant in the above-styled proceedings.
3. I was represented by Mr. Robert A. Bartlett, Esq., of the law firm of Ragsdale, Beals, Seigler, Patterson & Gray, LLP in connection with this Court's Order entered on February 19, 2013 [Doc. No. 125], granting in part and denying in part plaintiff's motion to hold defendants in contempt [Doc. No. 108] for failure to provide full and complete responses to plaintiff's post-judgment discovery, as previously ordered by this Court [Doc. No. 106]; and in the process by which such

contempt was purged, as determined by this Court's Order entered on April 18, 2013 [Doc No 162].

4. Mr. Bartlett also represented me in connection with the appeal of this Court's February 19, 2013 Order to the Eleventh Circuit Court of Appeals, which appeal was dismissed by an order entered on the docket of this case on June 24, 2013 [Doc. No. 165].

5. It was my understanding that Mr. Bartlett's representation of me terminated no later than the entry of the order of the Eleventh Circuit Court of Appeals in this Court on June 24, 2013; and I have not considered Mr. Bartlett to be my attorney in this matter since that time.

6. I have recently been served with "Plaintiff's Post-Judgment Discovery Requests to Defendant Steve Mokalled," consisting of Interrogatories and Requests for Production of Documents, a copy of which was also served upon Mr. Bartlett.

7. I intend to respond to those Discovery Requests without the assistance of Mr. Bartlett, whom I no longer consider to be my attorney in this matter.

8. I have been informed by Mr. Bartlett that for avoidance of doubt I should provide a Certificate of Consent to his withdrawal as my counsel in the format set forth in Local Rule 83.1E of this Court, which I hereby do, as follows:

a. I have received written notice of the intention of Mr. Robert A. Bartlett, of the law firm of Ragsdale, Beals, Seigler, Patterson & Gray, LLP, to request permission to withdraw as my attorney in this above-styled civil action;

b. I understand that unless I consent to the withdrawal of Mr. Robert A. Bartlett, of the law firm of Ragsdale, Beals, Seigler, Patterson & Gray, LLP, I have fourteen (14) days from the date of the written notice to object to such withdrawal;

c. I hereby consent to withdrawal of Mr. Robert A. Bartlett, of the law firm of Ragsdale, Beals, Seigler, Patterson & Gray, LLP, as my attorney in this above-styled civil action; and join in his request for permission to withdraw as my attorney in this above-styled civil action;

d. I have been informed of the address and telephone number of the Clerk of this Court, which are as follows:

Office of the Clerk of Court
United States District Court,
Northern District of Georgia
Richard B. Russell Federal Building and Courthouse
75 Spring Street, SW
2211 U.S. Courthouse
Atlanta, GA 30303-3361

Telephone: (404) 215-1660;

e. I have been informed of the address and telephone number of opposing counsel in this case, which are as follows:

Jeffrey W. Melcher & Parks K. Stone
GORDON & REES, LLP
The Pinnacle Building
3455 Peachtree Road
Suite 1500
Atlanta, Georgia 30326

Telephone: (404) 869-9054;

f. I understand that this Court retains jurisdiction of this civil action;

g. I understand I have the burden of keeping the court informed respecting where notices, pleadings or other papers may be served upon me;

h. I understand I have the obligation to prepare for any trial or hearing that may be set in this matter, or hire other counsel to prepare for any such trial or hearing when the date has been set for any such trial or hearing;

i. I understand that if I fail or refuse to meet these burdens, I may suffer adverse consequences, including, in criminal cases, bond forfeiture and arrest;

j. I understand that there are presently no scheduled proceedings in this civil action, but I have been served with "Plaintiff's Post-Judgment Discovery Requests to Defendant Steve Mokalled," consisting of Interrogatories and Requests for Production of Documents; and the responses required to those Post-Judgment Discovery Requests, as well as the holding of any proceedings that may be scheduled in this case, will not be affected by the withdrawal of counsel;

k. I understand that service of notices in this case may be made upon me at my last known address.

9. I understand that pursuant to the provisions of LR. 83.1(E)(4), whenever an attorney withdraws or dies or is removed or suspended or for any other reason ceases to act as attorney of record, the party whom the attorney was

representing must within twenty-one (21) days or before any further proceedings are had in the action before the court notify the clerk of the appointment of another attorney or of the party's decision to appear *pro se*; that the party must also provide the clerk with the current telephone number and address of the newly-appointed attorney or of the party, if proceeding *pro se*; and that failure to comply with this rule shall constitute a default by the party.

10. Consistent with those provisions, this is to advise this Court and the Clerk that I intend to proceed *pro se* in this matter, that service of notices, pleadings or other papers may be made upon me at the following mailing address, and that my current phone number is as follows:

Steve Mokalled
P.O. Box 17431
Greenville, SC 29606

Telephone: (706) 457-9296.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 31st day of January, 2014.


Steve Mokalled

P.O. Box 17431
Greenville, SC 29606

Telephone: (706) 457-9296

[Signatures Continued on Next Page]

10. Consistent with those provisions, this is to advise this Court and the Clerk that I intend to proceed *pro se* in this matter, that service of notices, pleadings or other papers may be made upon me at the following mailing address, and that my current phone number is as follows:

Steve McKelley
c/o POTH, PA
P.O. Box 27290
Greenville, SC 29616

16. Bob,
Please change
the mailing address.

Thanks,
Steve

STEVE IVUKACHU

Telephone: (706) 457-9296

5

This "Certificate of Certificate of Consent to Withdrawal
of Counsel of Steve Mokalled and Declaration Regarding Same"
has been Prepared and is Presented by:

/s/ Robert A. Bartlett
Robert A. Bartlett
Georgia Bar No. 040550
rbartlett@rbspg.com

Ragsdale, Beals, Seigler,
Patterson & Gray, LLP
2400 International Tower
229 Peachtree St., N.E.
Atlanta, GA 30303
Telephone: (404) 588-0500
Fax: (404) 523-6714

*Terminated or Withdrawing Attorney
for Defendant Steve Mokalled*

CERTIFICATE OF SERVICE

I certify that I am over the age of 18 and that on this date I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which will cause an electronic notification of such filing to be sent to all persons listed as receiving notice of the filing of pleadings in this case.

I further certify that I have placed a copy of the foregoing pleading in United States first class mail with sufficient postage thereon to assure delivery addressed to the following persons at the following addresses:

Jeffrey W. Melcher
Parks K. Stone
Gordon & Rees LLP
The Pinnacle Building
3455 Peachtree Road, Suite 1500
Atlanta, Georgia 30326

Mr. Steve Mokalled
c/o Pohl, PA
P.O. Box 27290
Greenville, SC 29616

Dated: February 25, 2014

Ragsdale, Beals, Seigler,
Patterson & Gray, LLP
2400 International Tower
229 Peachtree St., N.E.
Atlanta, GA 30303
Telephone: (404) 588-0500

/s/ Robert A. Bartlett .
Robert A. Bartlett
Georgia Bar No. 040550
rbartlett@rbsp.com